## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

GLENN LIOU, individually and on behalf of all others similarly situated,	) ) Case No. 1:20-cv-00141-JPO
Plaintiff,	)
V.	)
MULTIPLAN, INC.,	)
Defendant.	)
	)

## NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i), Plaintiff Glenn Liou ("Liou" or "Plaintiff"), through his counsel, hereby gives notice of his voluntary dismissal of this case, without prejudice.

- 1. On January 7, 2020, Plaintiff filed this action against Defendant MultiPlan, Inc. *See* ECF No. 1.
  - 2. MultiPlan has not answered or moved for summary judgment.
- 3. Fed. R. Civ. P. 41(a)(1)(A)(i) provides that so long as the opposing party has not yet served either an answer or motion for summary judgment in response to the complaint, a plaintiff may voluntarily dismiss his case without a court order by filing a notice of dismissal. *Alix v. McKinsey & Co.*, No. 18-CV-4141 (JMF), 2020 U.S. Dist. LEXIS 118040, at \*9 (S.D.N.Y. July 6, 2020) (citing Fed. R. Civ. P. 41(a)(1)(A)(i)).
  - 4. Plaintiff hereby gives such notice of voluntary dismissal.
  - 5. Therefore, this action should be dismissed without prejudice.

Dated: July 24, 2020 Respectfully Submitted,

/s/ Keith J. Keogh KEOGH LAW, LTD. Keith J. Keogh (admitted Pro Hac Vice) 55 W. Monroe St. Ste. 3390 Chicago, IL 60603 (312) 726-1092 / (312) 726-1093 keith@keoghlaw.com Attorney for Plaintiff

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 24, 2020, the foregoing document, including the Motion referenced therein, was served on all counsel of record via the Court's CM/ECF System.

/s/ Keith J. Keogh
Keith J. Keogh